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Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (SMB) SIPA LIQUIDATION (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Plaintiff, v. PLAZA INVESTMENTS INTERNATIONAL LIMITED, and NOTZ, STUCKI MANAGEMENT (BERMUDA) LIMITED Defendants.	Adv. Pro. No. 10-04284 (SMB)

**STIPULATION AND ORDER STAYING TRUSTEE'S RESPONSE TO
DEFENDANT NOTZ STUCKI MANAGEMENT (BERMUDA) LIMITED'S
MOTION TO DISMISS BASED ON EXTRATERRITORIALITY**

WHEREAS:

A. On June 19, 2015, Irving H. Picard (the "Trustee"), as trustee for the liquidation of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-lll, and the substantively consolidated estate of Bernard L. Madoff ("Madoff") and Defendants Plaza Investments International Limited ("Plaza"), and Notz, Stucki Management (Bermuda) Limited ("NSMB"), reached a settlement agreement (the "Agreement") resolving the claims at issue in the above-captioned adversary proceeding. On that same day the Trustee filed with this Court a Motion seeking entry of an order, pursuant to section 105(a) of the United States Bankruptcy Code and Rules 2002 and 9019 of the Federal Rules of Bankruptcy Procedure, approving the Agreement (the "9019 Motion"). The 9019 Motion is set to be heard on July 29, 2015.

B. The Trustee's response to NSMB's Motion to Dismiss Based on Extraterritoriality (Dkt No. 68) is due on June 30, 2015 before the pending 9019 Motion will be heard.

NOW, THEREFORE, subject to the approval of the Court, it is hereby STIPULATED AND AGREED that:

1. The Trustee is not required to file a response to NSMB's Motion to Dismiss Based on Extraterritoriality (Dkt No. 68) on June 30, 2015.

2. The Trustee's response to NSMB's Motion to Dismiss Based on Extraterritoriality (Dkt No. 68) is stayed in light of the pending 9019 Motion.

Dated: June 22, 2015

BAKER & HOSTETLER LLP

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*Attorneys for Irving H. Picard,
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SIPA Liquidation of the estate of Bernard L.
Madoff Investment Securities LLC and the
estate of Bernard L. Madoff*

Dated: New York, New York
June 22nd, 2015

SO ORDERED.

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

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